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8 Attorney for Ronald DeFusco

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11 UNITED STATES DISTRICT COURT

12 DISTRICT OF NEVADA

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14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 PIERRE FRANCO-RAMOS,  
18 VICTOR VAZQUEZ,  
19 ANDRE JACKSON,  
RONALD DEFUSCO, and  
DANNY GOODMAN

Defendants.

Case No. 2:15-cr-00286-RFB-VCF

**STIPULATION TO MODIFICATIONS OF  
CONDITIONS OF PRETRIAL RELEASE**

**(EXPEDITED RELIEF REQUESTED)**

19 Defendant, Ronald DeFusco, by and through his Counsel of record, Kathleen Bliss Law  
20 PLLC, and the United States of America, by Daniel Schiess, Assistant United States Attorney,  
21 hereby submit this Stipulation to modification of Mr. DeFusco's conditions of pre-trial release,  
22 which would allow Mr. DeFusco to (1) travel to any state within the continental United States  
23 provided that Mr. DeFusco notify his Pretrial Services Officer, seven (7) days in advance of travel,  
24 and (2) remove the requirement that Mr. DeFusco undergo any drug testing. Counsel for Mr.  
25 DeFusco and the United States further stipulate to a temporary modification releasing Mr.  
26 DeFusco's passport to enable him to obtain an updated driver's license in compliance with the  
27 REAL ID Act. All other conditions of pre-trial release would remain the same.

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1           Counsel for the United States has conferred with Mr. DeFusco's Pretrial Services Officer,  
2 Ronald Pease, who does not oppose these modifications.

3           Dated this 5th day of October 2018.

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6           By:        /s/ Kathleen Bliss  
7                   Kathleen Bliss, Esq.  
8                   Attorney for Ronald DeFusco

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11          By:        /s/ Daniel Schiess  
12                   Daniel Schiess  
13                   Attorney for the United States

14          Based on the foregoing Stipulation of the parties, and good cause appearing, it is hereby  
15 ORDERED that:

16          Defendant Ronald DeFusco's conditions of pretrial release are modified as follows: (1) Mr.  
17 DeFusco may travel to any state within the continental United States provided that he notify his  
18 Pretrial Services Officer seven (7) days in advance of travel; (2) Mr. DeFusco is no longer  
19 required to undergo any drug testing; and (3) Mr. DeFusco's passport will be released to him on a  
20 temporary basis for the limited purpose of obtaining an updated driver's license in compliance  
21 with the REAL ID Act. Once Mr. DeFusco has obtained an updated driver's license, he will  
22 surrender his passport to Ronald Pease with Pretrial Services.

23          IT IS SO ORDERED.

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26 DATED: October 8, 2018

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RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE